

**WILLKIE FARR & GALLAGHER LLP**

MARTIN KLOTZ  
212 728 8688  
mklotz@willkie.com

787 Seventh Avenue  
New York, NY 10019-6099  
Tel: 212 728 8000  
Fax: 212 728 8111

November 10, 2014

**VIA ECF**

The Honorable Loretta A. Preska  
Chief United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2220  
New York, NY 10007

Re: Cohen v. Cohen et al., 09-CV-10230 (LAP)

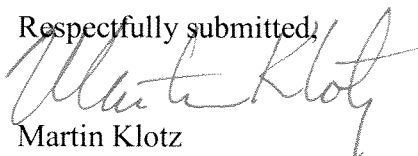
Dear Chief Judge Preska:

We write on behalf of Defendants Steven Cohen and Donald Cohen (“Defendants”) in advance of the conference before Your Honor scheduled for November 17, 2014 in the above-referenced action. In light of the number of letters recently submitted by the parties—nine in total—we thought it would be helpful to provide a succinct list of the issues before the Court.

1. Defendants’ request to immediately file a motion for summary judgment on Statute of Limitations grounds and a stay of discovery pending the resolution of that motion. (ECF Nos. 131, 133, 134.)
2. Plaintiff’s request to compel the production of Steven Cohen’s Wells notices from, and submissions to, the SEC regarding alleged insider trading and whether such topics are relevant and may be explored at Steven Cohen’s deposition. (ECF Nos. 132, 135, 136.)
3. Defendants’ request to compel the production of Plaintiff’s communications with Michael Bowe and non-attorney Stacey Napp, which have been withheld on the basis of attorney-client and/or work product privilege grounds. (ECF Nos. 138, 139, 140.)

We look forward to seeing Your Honor on November 17 to discuss these issues.

Respectfully submitted,



Martin Klotz

cc: Gerald B. Lefcourt, Esq.  
Sheryl E. Reich, Esq.